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CR24-00559 TUC-RCC(MSA)

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

United States of America,

Plaintiff,

vs.

Robert Valdez, Jr.,

Defendant.

Case No. 23-MJ-9309

INDICTMENT

Violation:
18 U.S.C. §§ 922(a)(1)(A) and
924(a)(1)(D)
Engaging in the Business of Dealing
Firearms without a License

18 U.S.C. § 924(d)
28 U.S.C. § 2461(c)
Forfeiture Allegation

THE GRAND JURY CHARGES:

Between on or about September 21, 2022, and on or about November 28, 2022, in the District of Arizona, ROBERT VALDEZ, JR., not being a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, did willfully engage in the business of dealing firearms, in violation of Title 18, United States Code, Sections 922(a)(1)(A) and 924(a)(1)(D).

FORFEITURE ALLEGATION

Upon conviction of the offense alleged in this Indictment, ROBERT VALDEZ, JR., shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d), and Title 28, United States Code, Section 2461(c), any firearms involved in the commission of the offense, including, but not limited to:

Line #	Asset Description	Serial Number
1	Pioneer model Sporter 7.62 x 39 mm semi-automatic rifle	PAC1172610
2	Century Arms model BFT 47 7.62 x 39 mm semi-automatic rifle	BFT47006741
3	Two (2) Century Arms model VSKA 7.62 x 39 mm semi-automatic rifles	SV1724698, SV7124692
4	Two (2) Pioneer model Sporter 7.62 x 39 mm semi-automatic rifles	PAC1171127, PAC1171067
5	Palmetto State Armory model PSAK47 7.62 x 39 mm semi-automatic rifle	AKB078267
6	Two (2) Pioneer Arms model Sporter 7.62 x 39 mm semi-automatic rifles	PAC1177318, PAC1180970
7	Century Arms model VSKA 7.62 x 39 mm semi-automatic rifle	SV7122800
8	Century Arms model VSKA 7.62 x 39 mm semi-automatic rifle	SV7132484
9	Pioneer model Sporter 7.62 x 39 mm semi-automatic rifle	PAC1172319
10	Two (2) Century Arms model BFT47 7.62 x 39 mm semi-automatic rifles	BFT47016582, BFT47016588
11	Two (2) Century Arms model BFT 47 7.62 x 39 mm semi-automatic rifle	BFT47016242 BFT47016385

If any of the property described above, as a result of any act or omission of the defendant: a) cannot be located upon the exercise of due diligence; b) has been transferred or sold to, or deposited with, a third party; c) has been placed beyond the jurisdiction of the court; d) has been substantially diminished in value; or e) has been commingled with other property which cannot be divided without difficulty, it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property, including, but not limited to, all property, both real and personal, owned by the defendant.

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1 All pursuant to Title 18, United States Code, Section 924(d), Title 28, United States
2 Code, Section 2461(c) and Rule 32.2(a), Federal Rules of Criminal Procedure.

3
4 A TRUE BILL

5 /s/

6
7 FOREPERSON OF THE GRAND JURY
Dated: February 7, 2024

8
9 GARY M. RESTAINO
United States Attorney
10 District of Arizona

REDACTED FOR
PUBLIC DISCLOSURE

11 /s/

12 MATTHEW C. CASSELL
13 Assistant U.S. Attorney